

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES of AMERICA

v.

TYRONE LOUIS HARTS, JR.
a/k/a "Game,"
BRANDON JAVON SUTTON
a/k/a "B,"
CEDRIC LAMAR BROWN
a/k/a "Ced,"
ELIZAR EDWARD MARCUS
a/k/a "Mann,"
DORIAN DERRELL WILLIAMS
a/k/a "Doe," a/k/a "Dorain,"
AKEEM O'BRIEN TISDALE-GILES
a/k/a "Keem,"
JAMES JENKINS, JR.
a/k/a "Poo Poo," a/k/a "Poop,"
CHRISTOPHER MICHAEL DOZIER
a/k/a "Chris,"
MAURICE FLEMING
a/k/a "Mo Beatz,"
RONALD ERIC CAMPBELL
a/k/a "Pnut,"
EDWARD PIGOTTE
a/k/a "Black,"
MATTHEW TENNERROL BROWN
a/k/a "Matt,"
THERON LEVON HOLMES

Criminal No.: 4:24-CR- 00062

18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(8)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 924(d)(1)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 841(b)(1)(D)
21 U.S.C. § 843(b)
21 U.S.C. § 846
21 U.S.C. § 853
21 U.S.C. § 881
28 U.S.C. § 2461(c)

SEALED INDICTMENT

RECEIVED

JAN 24 2024

FLORENCE, S.C.

COUNT 1

THE GRAND JURY CHARGES:

Beginning at a time unknown to the grand jury, but beginning at least in or around January 2023, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **TYRONE LOUIS HARTS, JR., a/k/a "Game," BRANDON JAVON SUTTON, a/k/a "B," CEDRIC LAMAR BROWN, a/k/a "Ced,"**

ELIZAR EDWARD MARCUS, a/k/a “Mann,” DORIAN DERRELL WILLIAMS, a/k/a “Doe,” a/k/a “Dorain,” AKEEM O’BRIEN TISDALE-GILES, a/k/a “Keem,” JAMES JENKINS, JR., a/k/a “Poo Poo,” a/k/a “Poop,” CHRISTOPHER MICHAEL DOZIER, a/k/a “Chris,” MAURICE FLEMING, a/k/a “Mo Beatz,” RONALD ERIC CAMPBELL, a/k/a “Pnut,” EDWARD PIGOTTE, a/k/a “Black,” MATTHEW TENNERROL BROWN, a/k/a “Matt,” and THERON LEVON HOLMES, knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and did distribute heroin and marijuana, both Schedule I controlled substances, and cocaine, methamphetamine, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (commonly referred to as “fentanyl”), all Schedule II controlled substances;

The amount involved in the conspiracy attributable to each Defendant as a result of the Defendant’s own conduct, and the conduct of other conspirators reasonably foreseeable to the Defendant, is:

DEFENDANT	CONTROLLED SUBSTANCE(S)	PENALTY SECTION(S)
TYRONE LOUIS HARTS, JR., a/k/a “Game”	500 Grams or More of Cocaine Less than 50 kilograms of Marijuana	21 U.S.C. § 841(b)(1)(B) 21 U.S.C. § 841(b)(1)(D)
BRANDON JAVON SUTTON, a/k/a “B”	5 Kilograms or More of Cocaine	21 U.S.C. § 841(b)(1)(A)
CEDRIC LAMAR BROWN, a/k/a “Ced”	400 Grams or More of Fentanyl 500 Grams or More of a Mixture or Substance Containing Methamphetamine A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(A) 21 U.S.C. § 841(b)(1)(C)
ELIZAR EDWARD MARCUS, a/k/a “Mann”	5 Kilograms or More of Cocaine	21 U.S.C. § 841(b)(1)(A)
DORIAN DERRELL WILLIAMS, a/k/a “Doe,” a/k/a “Dorain”	400 Grams or More of Fentanyl	21 U.S.C. § 841(b)(1)(A)

DEFENDANT	CONTROLLED SUBSTANCE(S)	PENALTY SECTION(S)
AKEEM O'BRIEN TISDALE-GILES, a/k/a "Keem,"	500 Grams or More of a Mixture or Substance Containing Methamphetamine	21 U.S.C. § 841(b)(1)(A)
JAMES JENKINS, JR., a/k/a "Poo Poo," a/k/a "Poop"	400 Grams or More of Fentanyl	21 U.S.C. § 841(b)(1)(A)
CHRISTOPHER MICHAEL DOZIER, a/k/a "Chris"	500 Grams or More of Cocaine	21 U.S.C. § 841(b)(1)(B)
MAURICE FLEMING, a/k/a "Mo Beatz"	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
RONALD ERIC CAMPBELL, a/k/a "Pnut"	100 Grams or More of Heroin	21 U.S.C. § 841(b)(1)(B)
EDWARD PIGOTTE, a/k/a "Black"	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
MATTHEW TENNERROL BROWN, a/k/a "Matt"	500 Grams or More of a Mixture or Substance Containing Methamphetamine	21 U.S.C. § 841(b)(1)(A)
THERON LEVON HOLMES	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about March 10, 2023, in the District of South Carolina, the Defendant, **AKEEM O'BRIEN TISDALE-GILES, a/k/a "Keem,"** knowingly, intentionally, and unlawfully did attempt to possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about March 10, 2023, in the District of South Carolina, the Defendant, **AKEEM O'BRIEN TISDALE-GILES, a/k/a "Keem,"** knowingly used and carried a firearm during and in relation to, and possessed a firearm in furtherance of a drug trafficking crime prosecutable in a court of the United States, as alleged in Count 2 of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That on or about August 31, 2023, in the District of South Carolina, the Defendant, **CHRISTOPHER MICHAEL DOZIER, a/k/a "Chris,"** knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That on or about September 18, 2023, in the District of South Carolina, the Defendant, **TYRONE LOUIS HARTS, JR., a/k/a "Game,"** knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That on or about September 18, 2023, in the District of South Carolina, the Defendant, **TYRONE LOUIS HARTS, JR., a/k/a “Game,”** knowingly possessed a firearm and ammunition, all of which had been shipped and transported in interstate and foreign commerce, to wit: a Smith and Wesson M&P9 9mm M2.0 caliber firearm and 9mm caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 7

THE GRAND JURY FURTHER CHARGES:

That on or about September 18, 2023, in the District of South Carolina, the Defendant, **TYRONE LOUIS HARTS, JR., a/k/a “Game,”** knowingly used and carried a firearm during and in relation to, and possessed a firearm in furtherance of a drug trafficking crime prosecutable in a court of the United States, as alleged in Count 5 of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That on or about September 21, 2023, in the District of South Carolina, the Defendant, **AKEEM O'BRIEN TISDALE-GILES, a/k/a “Keem,”** knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute 50 grams or more of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 9

THE GRAND JURY FURTHER CHARGES:

That on or about October 31, 2023, in the District of South Carolina, the Defendant, **CEDRIC LAMAR BROWN, a/k/a “Ced,”** knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly referred to as “fentanyl”), and a quantity of cocaine, both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 10

THE GRAND JURY FURTHER CHARGES:

That on or about October 31, 2023, in the District of South Carolina, the Defendant, **CEDRIC LAMAR BROWN, a/k/a “Ced,”** knowingly possessed a firearm and ammunition, all of which had been shipped and transported in interstate and foreign commerce, to wit: a Walther P22 .22 caliber firearm and .22 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 11

THE GRAND JURY FURTHER CHARGES:

That on or about October 31, 2023, in the District of South Carolina, the Defendant, **CEDRIC LAMAR BROWN, a/k/a “Ced,”** knowingly used and carried a firearm during and in relation to, and possessed a firearm in furtherance of a drug trafficking crime prosecutable in a court of the United States, as alleged in Count 9 of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 12

THE GRAND JURY FURTHER CHARGES:

That on or about November 9, 2023, in the District of South Carolina, the Defendant, **ELIZAR EDWARD MARCUS, a/k/a "Mann,"** knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNTS 13-22

THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, in the District of South Carolina, the named Defendants knowingly and intentionally did use a communication facility, to wit: a telephone, to facilitate the commission of a felony under the Controlled Substances Act, to wit: conspiracy to possess with intent to distribute and possession with intent to distribute and distribution of controlled substances as set forth above; and did aid and abet each other in the commission of the aforesaid offense, in violation of Title 21, United States Code, Sections 841(a)(1) and 846:

COUNT	DATE	DEFENDANT(S)
13	8/3/2023	TYRONE LOUIS HARTS, JR., a/k/a "Game," BRANDON JAVON SUTTON, a/k/a "B"
14	8/8/2023	TYRONE LOUIS HARTS, JR., a/k/a "Game," CHRISTOPHER MICHAEL DOZIER, a/k/a "Chris,"
15	10/10/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," AKEEM O'BRIEN TISDALE-GILES, a/k/a "Keem," MATTHEW TENNERROL BROWN, a/k/a "Matt"
16	10/11/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," DORIAN DERRELL WILLIAMS, a/k/a "Doe," a/k/a "Dorain,"
17	10/11/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," JAMES JENKINS, JR., a/k/a "Poo Poo," a/k/a "Poop"
18	10/11/2023	EDWARD PIGOTTE, a/k/a "Black," CEDRIC LAMAR BROWN, a/k/a "Ced"
19	10/26/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," THERON LEVON HOLMES

COUNT	DATE	DEFENDANT(S)
20	10/28/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," RONALD ERIC CAMPBELL, a/k/a "Pnut,"
21	10/31/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," MAURICE FLEMING, a/k/a "Mo Beatz"
22	10/31/2023	CEDRIC LAMAR BROWN, a/k/a "Ced," ELIZAR EDWARD MARCUS, a/k/a "Mann"

All in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

SENTENCING ENHANCEMENT PROVISIONS

THE GRAND JURY FURTHER CHARGES:

The Defendant, **CEDRIC LAMAR BROWN**, a/k/a “Ced,” prior to committing the violation contained in Count 1 and Count 9 of this Indictment, had the following conviction for a serious drug felony, pursuant to Title 21, United States Code, Section 802(57), that had become final for the purposes of Title 21, United States Code, Section 841:

- a. March 28, 2007: a conviction in for a serious drug felony in the United States District Court for the District of South Carolina, Docket Number 4:05-cr-01300, for which the Defendant served more than 12 months in prison.

In violation of Title 21, United States Code, Sections 802, 841, and 851.

THE GRAND JURY FURTHER CHARGES:

The Defendant, **RONALD ERIC CAMPBELL**, a/k/a “Pnut,” prior to committing the violation contained in Count 1 of this Indictment, had the following conviction for a serious drug felony, pursuant to Title 21, United States Code, Section 802(57), that had become final for the purposes of Title 21, United States Code, Section 841:

- a. March 30, 2009: a conviction for a serious drug felony in the United States District Court for the District of South Carolina, Docket Number 4:08-cr-00179, for which the Defendant served more than 12 months in prison.

In violation of Title 21, United States Code, Sections 802, 841, and 851.

FORFEITURE

FIREARM/DRUG OFFENSES:

Upon conviction for felony violation of Title 18 and Title 21, United States Code as charged in this Indictment, the Defendants, **TYRONE LOUIS HARTS, JR., a/k/a "Game," BRANDON JAVON SUTTON, a/k/a "B," CEDRIC LAMAR BROWN, a/k/a "Ced," ELIZAR EDWARD MARCUS, a/k/a "Mann," DORIAN DERRELL WILLIAMS, a/k/a "Doe," a/k/a "Dorain," AKEEM O'BRIEN TISDALE-GILES, a/k/a "Keem," JAMES JENKINS, JR., a/k/a "Poo Poo," a/k/a "Poop," CHRISTOPHER MICHAEL DOZIER, a/k/a "Chris," MAURICE FLEMING, a/k/a "Mo Beatz," RONALD ERIC CAMPBELL, a/k/a "Pnut," EDWARD PIGOTTE, a/k/a "Black," MATTHEW TENNERROL BROWN, a/k/a "Matt," and THERON LEVON HOLMES,** shall forfeit to the United States all of the Defendants' right, title and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code.
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violation of 18 U.S.C. § 922 or 924, or violation of any other criminal law of the United States or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for offenses charged in this Indictment includes, but is not limited to, the following:

A. Firearms:

- (1) Kimber .45 caliber firearm
Serial Number: KU327849
Seized from: Akeem O'Brien Tisdale-Giles
- (2) Walther P22 .22 caliber firearm
Serial Number: Z043798
Seized from: Cedric Lamar Brown
- (3) Smith and Wesson M&P9 9mm M2.0 firearm
Serial Number: NCE0178
Seized from: Tyrone Louis Harts, Jr.

B. Ammunition:

- (1) Miscellaneous rounds of .45 caliber ammunition
Seized from: Akeem O'Brien Tisdale-Giles
- (2) Miscellaneous rounds of .22 caliber ammunition
Seized from: Cedric Lamar Brown
- (3) Miscellaneous rounds of 9mm caliber ammunition
Seized from: Tyrone Louis Harts, Jr.

C. Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result for their violation of 21 U.S.C. §§ 841, 843 and 846.


SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A True Bill

FORBPERSON

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